

Summary: Officer Dominguez is a Defendant who was at the scene with Anthony Timpa was killed. His testimony will include what he saw on scene and the actions of the police as well as training on CIT calls and use of force.

Expected duration of direct/cross: 2 hrs.

4. Dustin Dillard

Address: c/o Defendants' counsel

Summary: Officer Dillard is a Defendant who was at the scene with Anthony Timpa was killed. His testimony will include what he saw on scene and the actions of the police as well as training on CIT calls and use of force..

Expected duration of direct/cross: 2 hr.

5. Domingo Rivera

Address: c/o Defendants' counsel

Summary: Officer Rivera who was at the scene with Anthony Timpa was killed. His testimony will include what he saw on scene and the actions of the police as well as training on CIT calls and use of force..

Expected duration of direct/cross: 1/2 hrs.

6. Danny Vasquez

Address: c/o Defendants' counsel

Summary: Officer Vasquez is a Defendant who was at the scene with Anthony Timpa was killed. His testimony will include what he saw on scene and the actions of the police as well as training on CIT calls and use of force..

Expected duration of direct/cross: 1 hrs.

7. Michael D. Lyman, Ph.D

Address: 3703 Hunter Valley Dr.
Columbia, MO 65216
(573)875-7472

Summary: Dr. Lyman has formal training, education, independent research and experience over a collective 40 years as a law enforcement agent, criminal investigator, police trainer and educator. Dr. Lyman is expected to testify concerning his qualifications, including his education, training and experience as a police expert. Dr. Lyman is expected to testify regarding his experience, training and familiarity with police procedures.

It is expected that Dr. Lyman will provide testimony upon the following subjects: The restraint techniques use by the City of Dallas Police Department Officers against Mr. Timpa are inconsistent with departmental policies and nationally recognized standards of care causing the death of Mr. Timpa; the restraint techniques used by the City of Dallas Police Officers against Mr. Timpa are unreasonable, unprofessional and inconsistent with nationally recognized policing standards of care and that it was unnecessary and unreasonable for Mr. Timpa to be restrained in a face down, prone position for an extended period of time.

Dr. Lyman is also expected to provide rebuttal testimony to that testimony offered by Defendants' expert(s) on police policy and procedure, if any. Dr. Lyman may also testify regarding any literature that he utilized in his evaluation or which he considered to be a reliable authority in the area and/or issues involved in this case. Dr. Lyman may also testify regarding, and express opinions or comment on testimony, reports, or opinions expressed by Defendants' agents or representatives, or other witnesses or experts.

Dr. Lyman is expected to testify based upon his review of the documents and records produced in discovery along with the pleadings filed in this case.

Expected duration of direct/cross: 1/2 hour

8. Kimberly Ann Collins, M.D.

Address: We Are Sharing Hope SC
Organ & Tissue Donation Services for South Carolina
Tissue Division
3950 Faber Place Dr., Ste. 400
North Charleston, South Carolina 29405
(800) 462-0755

Summary: Dr. Collins is a Pathologist Expert and Medical Director for Organ & Tissue Donation Services for South Carolina. She is board certified in anatomic pathology, clinical pathology, and forensic pathology. Dr. Collins will testify as to her opinion to a reasonable degree of medical certainty that Anthony Timpa's cause of death is mechanical asphyxia. She will testify that when the body is prone and great force is on the back, the head, neck, and shoulders become engorged with blood while the lower part of the body is of normal color. She will testify that Mr. Timpa had marked cyanosis with a clear line of demarcation across his chest indicative of inadequate circulation to and from the upper body. The blood was unable to return from the upper part of the body for proper circulation. This is indicative of a tremendous amount of pressure to his back. Forceful breathing resulted in muscle fatigue, lowering of the pH, and a build-up of lactic acid in the bloodstream. All of these developments are painful. As decreased oxygen is circulated to the brain, further panic, anxiety, and confusion occur. The body weakens and vision becomes blurred. The death is slow, and the victim experiences considerable pain and the panic of air hunger, as in the case of Mr. Timpa. She will testify that she agrees with the medical examiner's classification of the manner of death as a homicide. She will further rebut the testimony of Dr. Kroll.

Expected duration of direct/cross: ½ hour

9. Dr. Daniel Wohlgelernter

Address: 2299 Century Hill
Los Angeles, CA 90067
(310) 729-2202

Summary: Dr. Wohlgelernter is a board-certified cardiologist with substantial experience in sudden cardiac arrest and sudden cardiac death. Dr. Wohlgelernter will testify it is his opinion, with a reasonable degree of medical certainty, that Timpa's death was due to restraint/compressive asphyxia, secondary to compressive force applied to his shoulders, back, torso and extremities by the DPD officers with resultant respiratory compromise and subsequent

development of hypoxia/hypoxemia causing PEA and/or asystole and cardiac arrest. He will further rebut the testimony of Dr. Kroll.

Expected duration of direct/cross: ½ hour

10. Dr. Andrea McKenzie, Associate Professor
Address: Department of History
University of Victoria
3800 Finnerty Rd.
Clearihue Building Room A203
Victoria, B.C. V8W 3P4
(250) 721-7403

Summary: Dr. McKenzie is a legal, cultural and political historian of early modern England, with a particular expertise in seventeenth and eighteenth-century crim, trial, execution and print culture. Dr. McKenzie is a rebuttal expert to Dr. Mark Kroll. She will testify that Dr. Kroll's conclusions from her article "The Practice of Peine Forte et Dure in Seventeenth- and Eighteenth-Century England", *Law and History Review* 23, 2 (Summer 2005), 279-313 "is a misrepresentation or a misreading of [her] argument as well as the evidence of the 'historical records...of judicial pressing'." Her research, she emphasizes, has no application to the present case, as Dr. Kroll submits.

Expected duration of direct/cross: ½ hour

11. Martin J. Tobin, M.D.
Address: P.O. Box 1356
Hines, IL 60141
(708) 202-2705

Summary: Dr. Tobin is a critical care physician, pulmonologist and academic who is a recognized expert in acute respiratory failure, mechanical ventilation and neuromuscular control of breathing. Dr. Tobin will testify that the cause of Mr. Anthony Timpa's death was a low level oxygen in the cells of his body (asphyxia) caused by interference with breathing (compressive asphyxia).

Expected duration of direct/cross: ½ hour

12. Vicki Timpa
Address: c/o Geoff J. Henley
Henley & Henley
2520 Fairmount, Ste. 200
Dallas, TX 75201
(214) 821-0222

Summary: Ms. Timpa is Anthony Timpa's mother and Plaintiff herein. She will testify as to her relationship with her son and her extreme emotional distress from losing her son at the hands of the police.

Expected duration of direct/cross: ½ hour

13. Cheryll Timpa

Address: c/o Geoff J. Henley
Henley & Henley
2520 Fairmount, Ste. 200
Dallas, TX 75201
(214) 821-0222

Summary: Cheryll Timpa is the mother of Anthony's Timpa's child and Plaintiff herein.

Expected duration of direct/cross: ½ hour

14. K.T.

Address: c/o Geoff J. Henley
Henley & Henley
2520 Fairmount, Ste. 200
Dallas, TX 75201
(214) 821-0222

Summary: K.T. is the child of Anthony Timpa and Plaintiff herein.

Expected duration of direct/cross: ½ hour

B. May Present if Need Arises:

1. Julie Timpa Fecht

Address: 1026 Ivy Ln
Rockwall, Texas 75087

Ms. Fecht is sister of deceased Anthony Timpa.

Expected duration of direct/cross: 1 hour

Respectfully submitted,

s/Susan E. Hutchison

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ATTORNEYS FOR PLAINTIFF
JOE TIMPA

CERTIFICATE OF SERVICE

This is to certify that on this June 16, 2023, a true and correct copy of the above and foregoing document was served on the following attorney of record via ECF filing:

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